REMARKS

I. Status of Claims

Claims 1-3, 6, 9, and 12-20 are pending in this application. By this Amendment, claims 1, 6, 9, and 20 have been amended. Reconsideration of the rejections of all claims is earnestly solicited in view of the above amendments and the following remarks. The Amendments to the claims are fully supported by the specification and do not introduce new matter. Entry of this Amendment and timely allowance are requested.

II. Rejection of Claims under 35 U.S.C. § 103(a)

Claims 1-3, 6, 9, and 12-20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,946,499 to Saunders (hereinafter "*Saunders*"). The Examiner takes the position that Saunders teaches or suggests all the elements of claims 1, 6, 9, and 20. This rejection is respectfully traversed.

Applicants' invention discloses a system and method for providing a multi-modal text editing correction environment.

Saunders, on the other hand, discloses *only* a system and method for providing a plurality of textual manipulations, inputs, and textual output. (See column 1, lines 55-58)

Regarding claim 1, *Saunders* fail to teach or suggest all the elements of claim 1. Specifically, no portion of *Saunders* teaches or suggests the recitation of claim 1: *a mechanism to track initial entry of each specified portion of text into the document by each handler, such that each handler is* __*permanently*__ *associated with the specified portion of text it enters into the document.* The term: "permanently" has been added to further clarify that the prior art of record does not provide a permanent association between a property and a range of text, as further discussed in the Interview Summary Section. Thus, claim 1 is patentable at least for this reason.

Regarding dependent claims 2 and 3, claims 2 and 3 depend on independent claim 1. Thus, claims 2 and 3 are patentable at least by virtue of their dependency on claim 1.

Regarding independent claims 6, 9, and 20, claims 6, 9 and 20 are similar in scope to claim 1. As such, claims 6, 9, and 20 are patentable at least for similar reasons to claim 1.

Regarding dependent claims 12-19, claims 12-19 depend on independent claim 9. Thus, claims 12-19 are patentable at least by virtue of their dependency on claim 9.

III. Substance of Interview Summary Section

On Friday November 18th, an interview was conducted discussing independent claims 1, 6, 9, and 20 and how these claims compare to the cited prior art. In particular, the interview primarily focused on the tracking mechanism disclosed by applicant's invention and how it compares to the reservation identifier disclosed by Saunders. The Examiner tentatively agreed that Saunders does not teach or suggest a permanent association between a property and a range of text, wherein the property maintains an association between the range of text and the input device that initially entered the range of text. The Examiner also tentatively agreed that the proposed amendment of a "permanent association" would further distinguish the claimed invention over the prior art.

V. Conclusion

Having demonstrated that the cited references fail to disclose or suggest the invention as claimed, this application is in condition for allowance. Accordingly, applicant requests early and favorable reconsideration in the form of a Notice of Allowance.

If there are any questions regarding this amendment or the application in general, a telephone call to the undersigned would be appreciated, since this should expedite the prosecution of the application for all concerned.

If necessary to effect a timely response, this paper should be considered as a Petition for an Extension of Time sufficient to effect a timely response. Please charge any deficiency in fees or credit any overpayments to Deposit Account No. 19-2112 (Attorney Docket No. MFCP. 87509).

Respectfully submitted,

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